# EXHIBIT 15

# <u>Carlton Fields Fees Incurred After December 3, 2019</u> <u>and Supporting Documents</u>

Invoice	Amount Spent Complying with the Subpoena	Amount Spent Providing Other Legal Advice, Including Opposing the Subpoena
December	\$6,236	\$68,884.36
January	\$16,010.50	\$3,687.26
February	\$24,323.50	\$6,267.17
March	\$38,504	\$11,482.45
Totals	\$85,074	\$90,321.24



#### ATTORNEYS AT LAW

Atlanta Florham Park Hartford Los Angeles Miami New York Orlando Tallahassee Tampa Washington, DC West Palm Beach

JOSHUA RIZACK & THE RISING GROUP CONSULTING, INC. 606 POST ROAD EAST, 614 WESTPORT, CT 06880

PLEASE REMIT TO:

**CARLTON FIELDS** P.O. Box 3239 | Tampa, Florida 33601-3239 813.223.7000 | fax 813 229.4133

www.carltonfields.com

Fed ID: 59-1233896 BY WIRE:

ABA No: 0248

SWIFT:

Wells Fargo Bank, N.A.

US6S Account No.: 4575

Due Date: Upon Receipt

EMAIL: JRIZACK@THERISINGGROUP.COM

JANUARY 30, 2020

ATTORNEY: MICHAEL YAEGER REFERENCE NUMBER: 14062-39418

INVOICE NUMBER: 1043608

RE: CHEVRON CORPORATION LITIGATION

LEGAL SERVICES POSTED THROUGH 12/31/19 COSTS ADVANCED POSTED THROUGH 12/31/19 INTEREST

CURRENT INVOICE TOTAL

\$ 72,356.00 \$

1,098.10 1,666.26

75,120.36



Atlanta
Florham Park
Hartford
Los Angeles
Miami
New York
Orlando
Tallahassee
Tampa

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE

**RE: CHEVRON CORPORATION LITIGATION** 

JANUARY 30, 2020 REF NO.: 14062-39418 Washington, DC West Palm Beach

**INVOICE NUMBER: 1043608** 

## PROFESSIONAL SERVICES AS POSTED THROUGH DECEMBER 31, 2019

DATE	<u>INIT</u>	DESCRIPTION	<b>HOURS</b>
12/03/19	ABS	EMAILS WITH CHEVRON'S COUNSEL RE: RIZACK'S MOTION (0.2); TELECONFERENCE WITH CLIENT RE: SAME (0.2).	0.40
12/04/19	ABS	EMAILS WITH CHEVRON'S COUNSEL RE: BRIEFING SCHEDULE AND REVISE CHEVRON'S PROPOSED STIPULATION (0.3); REVIEW STIPULATION FILED WITH COURT AND CHEVRON'S COVER LETTER TO SAME (0.2).	0.50
12/05/19	MLY	TELECONFERENCE WITH CLIENT RE MOTION (.4); TELECONFERENCE WITH K. FAULKNER OF CRYPSIS RE FORENSIC ANALYSIS (.3); CORRESPONDENCE WITH CHEVRON RE DOCUMENT REVIEW (.2); INTERNAL CORRESPONDENCE AND CONFERENCES RE DOCUMENT REVIEW (.7).	1.60
12/05/19	ABS	EMAILS WITH CHEVRON'S COUNSEL RE: CRYPSIS'S INVOICES.	0.20
12/06/19	MLY	CONFERENCE WITH A. SILVERMAN RE DOCUMENT REVIEW (1.0); CORRESPONDENCE WITH CRYPSIS AND INTERNAL TEAM RE DOCUMENT REVIEW (.5); TELECONFERENCE WITH CLIENT (.3).	1.80
12/06/19	ABS	REVIEW EMAIL FROM CHEVRON'S COUNSEL RE: PROTOCOL SEARCH TERMS AND CORRESPONDENCE WITH M. YAEGER RE: RESPONDING TO SAME.	0.70
12/09/19	JK*	ANALYZE SOURCE DATA BEFORE PROCESSING IN RELATIVITY.	0.70
12/10/19	ABS	WORK RELATED TO RESPONDING TO EMAIL FROM CHEVRON'S COUNSEL RE: FOUR REDACTED DOCUMENTS, INCLUDING REVIEW/ANALYZING DOCUMENTS AND DRAFTING DESCRIPTIONS OF REDACTIONS (0.6); REVIEW/ANALYZE CASE LAW CITED IN SEPARATE EMAIL FROM CHEVRON'S COUNSEL RE: REQUEST TO PRODUCE UNREDACTED COPIES (0.4); CORRESPONDENCE WITH M. YAEGER RE: RESPONDING	1.20

# Case 1:11-cv-00691-LAK-RWL Document 2482-15 Filed 04/21/20 Page 5 of 29

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

JANUARY 30, 2020 REF NO.: 14062-39418 INVOICE NUMBER: 1043608

DATE	<u>INIT</u>	DESCRIPTION	HOURS
		TO CHEVRON'S REQUEST (0.2).	
12/10/19	HS*	PULL DOCUMENTS FROM RELATIVITY.	0.40
12/10/19	HS*	PULL DOCUMENTS FROM RELATIVITY PER COUNSEL.	0.60
12/10/19	JK*	DISCUSS SOURCE DATA DETAILS WITH COLLECTIONS EXPERT. ANALYZE SOURCE DATA BEFORE PROCESSING IN RELATIVITY.	2.20
12/11/19	ABS	RESEARCH NEW YORK CASE LAW RE: REDACTION.	1.20
12/12/19	ABS	DRAFT EMAIL TO CHEVRON'S COUNSEL RE: UNREDACTED DOCUMENTS (0.2); EMAILS WITH CHEVRON'S COUNSEL AND CRYPSIS RE: CRYPSIS'S REQUEST FOR BUDGET APPROVAL (0.3).	0.50
12/12/19	RT*	REPRODUCE REDACTED DOCUMENTS IN UNREDACTED VERSION.	0.70
12/16/19	MLY	CONFERENCE WITH A. SILVERMAN RE SCHEDULING OF MOTION (.1).	0.10
12/17/19	JK*	UPDATE SEARCH TERM REPORTS FROM RELATIVITY AND SEND DETAILS TO CASE TEAM.	0.80
12/18/19	MLY	ANALYZING CHEVRON'S OPPOSITION BRIEF AND PLANNING REPLY BRIEF.	5.90
12/18/19	KMS	RESEARCH FOR UPCOMING BRIEF REGARDING PAYMENT OF ATTORNEYS FEES.	1.40
12/18/19	ABS	REVIEW/ANALYZE CHEVRON'S OPPOSITION BRIEF AND 35 EXHIBITS ANNEXED THERETO, INCLUDING OUTLINING REPLY TO SAME (2.0); REVIEW CASE LAW CITED IN SUPPORT OF CHEVRON'S OPPOSITION (0.5); MEETINGS WITH M. YAEGER AND K. SANDOVAL RE: REPLY (0.7).	3.20
12/18/19	JK*	CONTACT VENDOR FOR CUSTODIAN COLLECTION DETAILS.	0.20
12/19/19	MLY	DRAFTING REPLY BRIEF.	4.90
12/19/19	KMS	RESEARCH ADDRESSING OPPOSING COUNSEL'S ARGUMENTS IN PREPARATION FOR DRAFTING OUR REPLY.	2.30
12/19/19	KMS	DISCUSS RESEARCH AND ANALYSIS NEEDED FOR OUR REPLY IN SUPPORT OF MOTION REGARDING ATTORNEYS' FEES IN PREPARATION FOR COURT FILING	1.70
12/19/19	ABS	FURTHER REVIEW/ANALYSIS OF CHEVRON OPPOSITION, EXHIBITS ANNEXED TO OPPOSITION,	14.20

JANUARY 30, 2020 REF NO.: 14062-39418 INVOICE NUMBER: 1043608

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
		EXHIBITS ANNEXED TO CHEVRON'S MOTION TO COMPEL, DEPOSITION TRANSCRIPTS, AND VARIOUS OTHER FILINGS IN THIS LITIGATION (2.5); WORK WITH LITIGATION SUPPORT RE: TEXT MESSAGES PRODUCED TO CHEVRON AND REVIEW SAME IN CONNECTION WITH REPLY (0.5); EMAILS WITH CRYPSIS RE: TEXT MESSAGES (0.2); CONTINUE ANALYZING CASE LAW CITED IN CHEVRON'S OPPOSITION (0.7); ANALYZE CASES LOCATED BY K. SANDOVAL (0.3) AND SEPARATELY RESEARCH CASE LAW IN CONNECTION WITH REPLY (1.1); MEETING WITH M. YAEGER (1.3) AND K. SANDOVAL (0.7) IN CONNECTION WITH PREPARING REPLY; BEGIN DRAFTING REPLY BRIEF (6.7); EMAILS WITH CHEVRON'S COUNSEL RE: CRYPSIS'S INVOICES (0.2).	
12/19/19	JK*	CONTACT VENDOR FOR CUSTODIAN COLLECTION DETAILS. REVIEW SEARCHES IN RELATIVITY REVIEW WORKSPACE AS REQUESTED BY CASE TEAM.	0.70
12/20/19	MLY	DRAFTING REPLY BRIEF FOR MOTION RE PROTOCOL DEADLINES AND REASONABLE FEES.	6.70
12/20/19	KMS	DRAFT LETTER MOTION REGARDING EXTENSION OF PAGE LIMIT FOR UPCOMING REPLY BRIEF FILING	3.20
12/20/19	KMS	DRAFT DECLARATION FOR CLIENT IN PREPARATION FOR UPCOMING REPLY BRIEF FILING	2.90
12/20/19	KMS	RESEARCH CASE LAW RE RECONSIDERATION AND ATTORNEYS FEES IN PREPARATION FOR WRITING REPLY BRIEF	3.20
12/20/19	ABS	CONTINUE DRAFTING/REVISING REPLY BRIEF (6.3); REVISE LETTER TO COURT RE: PAGE LENGTH EXTENSION (0.3); FURTHER ANALYSIS OF CASE LAW IN SUPPORT OF REPLY BRIEF (1.2); DRAFT/REVISE RIZACK DECLARATION IN SUPPORT (0.3) AND COMMUNICATIONS WITH CLIENT RE: SAME (0.2); RESEARCH CASE LAW TO ADDRESS VARIOUS ISSUES FOR REPLY (1.2); DRAFT SILVERMAN DECLARATION IN SUPPORT (0.4).	9.90
12/21/19	MLY	DRAFTING REPLY BRIEF.	4.30
12/21/19	KMS	REVISE DRAFT OF OUR REPLY BRIEF FOR UPCOMING FILING.	2.80
12/21/19	ABS	CONTINUE DRAFTING/REVISING REPLY BRIEF (3.8); DRAFT/REVISE RIZACK DECLARATION IN SUPPORT (0.5)	4.70

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RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

JANUARY 30, 2020 REF NO.: 14062-39418 INVOICE NUMBER: 1043608

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
		AND COMMUNICATIONS WITH CLIENT RE: SAME (0.4).	
12/22/19	MLY	DRAFTING REPLY BRIEF.	3.50
12/22/19	KMS	EDIT REPLY BRIEF IN PREPARATION FOR UPCOMING FILING.	4.30
12/22/19	ABS	CONTINUE DRAFTING/REVISING SILVERMAN DECLARATION (0.6); FURTHER REVISIONS TO REPLY BRIEF (5.4); STRATEGY CALLS WITH M. YAEGER RE: REPLY (0.6).	6.60
12/22/19	JK*	CREATE SAVED SEARCHES RELATIVITY FOR EMAIL COMMUNICATION AS REQUESTED BY CASE TEAM	0.70
12/23/19	MLY	DRAFTING/REVISING REPLY BRIEF.	7.80
12/23/19	KMS	CONTINUE REVISIONS OF BRIEF FOR UPCOMING FILING.	4.90
12/23/19	ABS	CONTINUE DRAFTING/REVISING REPLY (6.9); COMMUNICATIONS WITH CLIENT RE: REPLY AND RELATED ISSUES (0.6); DRAFT/REVISE SILVERMAN DECLARATION (0.9); DRAFT/REVISE RIZACK DECLARATION (0.7); WORK WITH LITIGATION SUPPORT RE: TEXT MESSAGES (0.6); EMAILS WITH CRYPSIS RE: TEXT MESSAGES (0.5); FURTHER ANALYSIS OF CASES CITED IN CHEVRON'S OPPOSITION (0.8); FURTHER ANALYSIS OF CASES REBUTTING THOSE CITED IN CHEVRON'S OPPOSITION (1.4); MEETINGS WITH M. YAEGER RE: REPLY (0.5); ANALYZE CORRESPONDENCE WITH CHEVRON'S COUNSEL AND DOCUMENTS PRODUCED UNDER PROTOCOL (1.2).	14.10
12/23/19	JK*	CREATE SAVED SEARCHES AND EXPORT DOCUEMNTS FROM RELATIVITY AS REQUESTED BY CASE TEAM.	0.90
12/24/19	MLY	FINALIZING BRIEF AND DECLARATIONS.	2.50
12/24/19	KMS	REVISE BRIEF FOR UPCOMING FILING.	0.50
12/24/19	ABS	REVISE AND FINALIZE REPLY BRIEF (5.6); REVISE AND FINALIZE RIZACK AND SILVERMAN DECLARATIONS (0.8); REVIEW AND FINALIZE EXHIBITS (0.7); CALLS WITH CRYPSIS RE: TEXT MESSAGES (0.5); COMMUNICATIONS WITH CLIENT RE: FINALIZING REPLY BRIEF AND DECLARATION (0.3).	7.90
12/24/19	JK*	CREATE SAVED SEARCHES AND EXPORT DOCUEMNTS FROM RELATIVITY AS REQUESTED BY CASE TEAM.	0.90

JANUARY 30, 2020 REF NO.: 14062-39418 INVOICE NUMBER: 1043608

DATE	<u>INIT</u>	DESCRIPTION	DESCRIPTION				
12/26/19	JK*		UPDATE SEARCH TERM REPORTS FROM RELATIVITY AND SEND DETAILS TO CASE TEAM.				
	TOTAL FEES FOR PROFESSIONAL SERVICES						
ATTORNE	Y FEE SUMM	<u>IARY</u>					
MLY	MICHAEL	YAEGER	39.10	hours at	\$665.00	=	26,001.50
KMS	KATELYN	M. SANDOVAL	27.20	hours at	\$400.00	=	10,880.00
ABS	ALEX B. S	ILVERMAN	65.30	hours at	\$500.00	=	32,650.00
HS*	HANNA ST	RANGE*	1.00	hours at	\$300.00	=	300.00
RT*	ROGER TI	RACEY*	0.70	hours at	\$255.00	=	178.50
JK*	JAMES KU	IBICZ*	9.20	hours at	\$255.00	=	2,346.00
	TOTALS		142.50				\$72,356.00
TOTAL FEE	ES FOR PRO	TOTAL FEES FOR PROFESSIONAL SERVICES					

# COSTS INCURRED ON YOUR BEHALF AS POSTED DECEMBER 31, 2019

	TELEPHONE	0.10
11/27/19	DOCUMENT PRODUCTION - FILING NOTICE OF	40.00
	MOTION, MEMORANDUM AND DECLARATION WITH	
	EXHIBITS	
12/19/19	WESTLAW RESEARCH MULTI-SEARCH DOCUMENT DISPLAYS	47.58
12/20/19	WESTLAW RESEARCH MULTI-SEARCH DOCUMENT DISPLAYS	174.46
12/22/19	WESTLAW RESEARCH MULTI-SEARCH DOCUMENT DISPLAYS	95.16
12/23/19	WESTLAW RESEARCH MULTI-SEARCH DOCUMENT DISPLAYS	260.90
12/24/19	WESTLAW RESEARCH MULTI-SEARCH DOCUMENT DISPLAYS	47.58
12/19/19	PROFESSIONAL SERVICES - VENDOR: CARMEL	96.85
	PRIVATE CAR & LIMOUSINE SERVICE - CAR SERVICE ON 11/25/19	
12/31/19	GROUND TRANSPORTATION - VENDOR: ALEX	90.47
	SILVERMAN - 12/19/19 AND 12/24/19 TRAVEL DUE TO	
	STAYING LATE TO CONTINUE WORKING ON REPLY BRIEF	
12/18/19	EDISCOVERY DATA MANAGEMENT HOSTING	55.00

## Case 1:11-cv-00691-LAK-RWL Document 2482-15 Filed 04/21/20 Page 9 of 29

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

JANUARY 30, 2020 REF NO.: 14062-39418 INVOICE NUMBER: 1043608

\$5/GB:RELATIVITY DATA HOSTING \$5 - PER GB 12/18/19 EDISCOVERY DATA MANAGEMENT USER LICENSES:RELATIVITY USER LICENSES

190.00

\$

TOTAL COSTS AS POSTED THROUGH DECEMBER 31, 2019

\$1,098.10

INTEREST

1,666.26

TOTAL AMOUNT DUE THIS INVOICE

75,120.36



#### ATTORNEYS AT LAW

Atlanta Florham Park Hartford Los Angeles Miami New York Orlando Tallahassee Tampa Washington, DC West Palm Beach

JOSHUA RIZACK & THE RISING GROUP CONSULTING, INC. 606 POST ROAD EAST, 614 WESTPORT, CT 06880

PLEASE REMIT TO:

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www.carltonfields.com Fed ID: 59-1233896

BY WIRE:

Wells Fargo Bank, N.A. ABA No: 0248

Account No.:

SWIFT: US6S 4575

Due Date: Upon Receipt

EMAIL: JRIZACK@THERISINGGROUP.COM

**FEBRUARY 13, 2020** 

ATTORNEY: MICHAEL YAEGER REFERENCE NUMBER: 14062-39418

INVOICE NUMBER: \*\*\*\*\*\*

RE: CHEVRON CORPORATION LITIGATION

LEGAL SERVICES POSTED THROUGH 01/31/20 COSTS ADVANCED POSTED THROUGH 01/31/20 INTEREST

CURRENT INVOICE TOTAL

17,618.50 \$ 413.00

1,666.26

19,697.76

## ATTORNEYS AT LAW



Atlanta
Florham Park
Hartford
Los Angeles
Miami
New York
Orlando
Tallahassee
Tampa

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE

**RE: CHEVRON CORPORATION LITIGATION** 

FEBRUARY 13, 2020 REF NO.: 14062-39418 Washington, DC West Palm Beach

INVOICE NUMBER: \*\*\*\*\*\*

## PROFESSIONAL SERVICES AS POSTED THROUGH JANUARY 31, 2020

DATE	<u>INIT</u>	DESCRIPTION	<b>HOURS</b>
11/25/19	RT*	RUN DOCUMENT CONFLICT CHECK AND PREPARE THE PRODUCTION.	1.50
11/25/19	RT*	MODIFY SEARCH SYNTA' ES, RUN NEW TERMS, CUSTOM E' CLUSIONS, AND REPORT ON NEW REVIEW SET.	1.50
01/06/20	MLY	TELECONFERENCES WITH A. SILVERMAN RE DOCUMENT REVIEW AND E-DISCOVERY VENDOR (.3); TELECONFERENCE WITH CLIENT (.5).	1.40
01/06/20	ABS	ANALYZE COURT ORDER (0.2); EMAILS WITH LITIGATION TECHNOLOGY TEAM RE: UPDATED VENDOR COSTS AND RELATED LOGISTICS (0.2); DRAFT EMAIL TO CHEVRONGS COUNSEL RE: PROTOCOL ACTION ITEMS (0.4).	0.80
01/07/20	MLY	CORRESPONDENCE AND TELECONFERENCES WITH TEAM AND VENDOR RE DOCUMENT REVIEW (1.4); CONFERENCES WITH A. SILVERMAN RE DOCUMENT REVIEW (.4).	1.80
01/07/20	ABS	REVISE EMAIL TO CHEVRONGS COUNSEL RE: PROTOCOL ACTION ITEMS (0.4); CALL AND EMAILS WITH M. FAIN OF EPIX RE: INVOICING TERMS AND LOGISTICS (0.4); REVIEW EPIX SERVICES AGREEMENT (0.2); MEETING WITH M. YAEGER ACTION ITEMS AND STRATEGY (0.2).	1.20
01/08/20	MLY	CORRESPONDENCE WITH OPPOSING COUNSEL RE DOCUMENT REVIEW (.2); INTERNAL CONFERENCES AND CORRESPONDENCE RE DOCUMENT REVIEW.	0.70
01/08/20	ABS	EMAILS WITH M. FAIN OF EPIX RE: INVOICING TERMS (0.2); REVISE EMAIL TO CHEVRON'S COUNSEL AS IT RELATES TO PAYMENT OF DOCUMENT REVIEW VENDOR (0.2); EMAILS WITH CHEVRON'S COUNSEL RE: MEET-AND-CONFER TO DISCUSS ACTION ITEMS (0.3).	0.70
01/08/20	JK*	SEARCH RELATIVITY XWORKSWORKSPACE FOR SPANISH LANGUAGE DOCUMENTS AS REXUESTED BY CASE TEAM.	0.90

FEBRUARY 13, 2020 REF NO.: 14062-39418 INVOICE NUMBER: \*\*\*\*\*\*

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
01/09/20	MLY	CONFERENCE WITH A. SILVERMAN RE DOCUMENT REVIEW.	0.20
01/10/20	MLY	MEET AND CONFER WITH OPPOSING COUNSEL RE DOCUMENT REVIEW (.9); TELECONFERENCE WITH K. FAULKNER (.4); CONFERENCE AND CORRESPONDENCE WITH A. SILVERMAN RE DOCUMENT REVIEW (.4); CORRESPONDENCE WITH OPPOSING COUNSEL RE DOCUMENT REVIEW (.2).	2.30
01/10/20	ABS	TELECONFERENCE WITH CHEVRONS COUNSEL RE: VARIOUS PROTOCOL ISSUES (0.9); TELECONFERENCE WITH K. FAULKNER OF CRYPSIS IN FOLLOW UP TO CRYPSIS CALL (0.4); MEET WITH M. YAEGER RE: PROTOCOL ACTION ITEMS (0.2); FOLLOW-UP EMAILS WITH CHEVRONS COUNSEL AND K. FAULKNER (0.3); WORK WITH PRACTICE TECHNOLOGY TEAM RE: ISSUES ADDRESSED ON CALL WITH CHEVRONS COUNSEL (0.5).	2.30
01/10/20	JK*	UPDATE SEARCH TERMS IN RELATIVITY TO NARROW DOWN REVIEW POPULATION. SEND REPORTS AND ANALYSIS AS REXUESTED BY CASE TEAM.	2.40
01/13/20	MLY	INTERNAL CONFERENCES AND CORRESPONDENCE RE DOCUMENT REVIEW (.5); CORRESPONDENCE WITH OPPOSING COUNSEL (.1).	0.60
01/13/20	ABS	PREPARE EMAIL TO CHEVRON'S COUNSEL RE: PROTOCOL DEVELOPMENTS AND FOLLOW UP TO 1/10/20 CALL.	0.60
01/13/20	RT*	PROVIDE REPORTING TO CASE TEAM ON HITS FROM CERTAIN DOMAINS.	0.80
01/13/20	JK*	UPDATE SEARCH TERMS IN RELATIVITY TO NARROW DOWN REVIEW POPULATION. SEND REPORTS AND ANALYSIS AS REXUESTED BY CASE TEAM.	1.00
01/14/20	ABS	EMAILS WITH K. FAULKNER RE: CHEVRON.	0.30
01/15/20	ABS	CALL WITH K. FAULKNER IN PREPARATION FOR CONFERENCE CALL WITH CHEVRON (0.8); REVIEW CRYPSIS BILLING AND CORRESPONDENCE WITH CHEVRON'S COUNSEL IN PREPARATION FOR CALL WITH K. FAULKNER (0.2).	1.00
01/16/20	MLY	CONFERENCE WITH A. SILVERMAN RE DOCUMENT REVIEW.	0.10
01/16/20	ABS	CONFERENCE WITH M. YAEGER RE: DOCUMENT REVIEW.	0.10

FEBRUARY 13, 2020 REF NO.: 14062-39418 INVOICE NUMBER: \*\*\*\*\*\*

<u>DATE</u>	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
01/17/20	MLY	CORRESPONDENCE AND TELECONFERENCES WITH TEAM RE DOCUMENT REVIEW (.7); CORRESPONDENCE WITH OPPOSING COUNSEL (.2).	0.90
01/17/20	ABS	EMAILS WITH CHEVRON'S COUNSEL RE: SEARCH TERM REVISIONS (0.6); ANALYZE REVISED SEARCH TERMS RECEIVED FROM CHEVRON AND INCORPORATE CHEVRON'S PROPOSED CHANGES IN PREPARATION FOR PROCESSING (0.4); TELECONFERENCE WITH K. FAULKNER AND CHEVRON'S COUNSEL RE: CRYPSIS'S BILLINGS (0.4); FOLLOW UP CALL WITH K. FAULKNER RE: INVOICES (0.2); WORK WITH PRACTICE TECHNOLOGY TEAM IN CONNECTION WITH PROCESSING REVISED SEARCH TERMS (0.3).	1.90
01/17/20	JK*	ANALYZE UPDATED SEARCH TERMS AND REPORT BACK TO TEAM WITH SUGGESTIONS TO MINIMIZE REVIEW POPULATION AS REXUESTED BY CASE TEAM.	0.90
01/21/20	MLY	CORRESPONDENCE WITH OPPOSING COUNSEL RE DOCUMENT REVIEW (.1); TELECONFERENCE WITH A. SILVERMAN RE DOCUMENT REVIEW (.1).	0.20
01/21/20	RT*	UPDATING SEVERAL TERMS AND RUNNING THE NEW SEARCH TERMS ACROSS THE DATA POPULATION.	1.10
01/22/20	MLY	CORRESPONDENCE WITH TEAM RE DOCUMENT REVIEW (.3); CORRESPONDENCE WITH OPPOSING COUNSEL RE DOCUMENT REVIEW.	0.40
01/22/20	ABS	ANALYZE RESULTS OF REVISED SEARCH TERMS (0.5); WORK WITH PRACTICE TECHNOLOGY TEAM RE: SEARCH TERM PROCESSING ISSUES (0.5); EMAILS WITH CHEVRON'S COUNSEL RE: REVISED SEARCH TERM RESULTS AND ISSUES PERTAINING TO PROCESSING OF SAME (0.5).	1.50
01/22/20	RT*	CASE TEAM SUPPORT AND RESPONDING TO SEVERAL XUESTIONS ON SEARCHES.	0.70
01/22/20	JK*	ANALYZE UPDATED SEARCH TERMS AND REPORT BACK TO TEAM WITH SUGGESTIONS TO MINIMIZE REVIEW POPULATION. RUN SEARCH TERMS AGAINST ALL COLLECTED DOCUMENTS AND SEND REPORTS TO CASE TEAM.	2.10
01/23/20	MLY	CONFERENCE WITH A. SILVERMAN RE DOCUMENT REVIEW.	0.10
01/23/20	ABS	CONFERENCE WITH M. YAEGER RE: DOCUMENT	0.10

FEBRUARY 13, 2020 REF NO.: 14062-39418 INVOICE NUMBER: \*\*\*\*\*\*

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>		
		REVIEW.			
01/24/20	MLY	CORRESPONDENCE WITH TEAM AND OPPOSING COUNSEL RE DOCUMENT REVIEW.	0.10		
01/24/20	ABS	EMAILS WITH CHEVRONG COUNSEL RE: UPDATED REVISIONS TO SEARCH TERMS (0.2); REVIEW CHEVRONG PROPOSED REVISIONS AND INCORPORATE SAME (0.2).	0.40		
01/27/20	MLY	CORRESPONDENCE AND CONFERENCE WITH TEAM RE DOCUMENT REVIEW (.4); TELECONFERENCE WITH CLIENT (.5).	0.90		
01/27/20	ABS	WORK WITH PRACTICE TECHNOLOGY TEAM RE: UPDATED SEARCH TERMS (0.3); EMAILS RE: EPIX ESTIMATE (0.2); EMAIL TO CHEVRON'S COUNSEL RE: SEARCH TERM RESULTS, EPIX ESTIMATE, AND RELATED PROTOCOL ISSUES (0.3); REVIEW PAGE CONTEMPT ORDER (0.4) AND EMAILS WITH CLIENT RE: SAME (0.2).	1.40		
01/27/20	RT*	UPDATE SYNTA' ERRORS AND RE-RUN SEARCHES PER ALE' SILVERMAN.	1.00		
01/27/20	JK*	ANALYZE UPDATED SEARCH TERMS AND REPORT BACK TO TEAM WITH SUGGESTIONS TO MINIMIZE REVIEW POPULATION AS REXUESTED BY CASE TEAM.	1.60		
01/28/20	MLY	CORRESPONDENCE AND TELECONFERENCE RE DOCUMENT REVIEW.	0.30		
01/28/20	ABS	EMAILS WITH CLIENT RE: ECUADORIAN JUDGMENT (0.2); REVIEW/ANALYZE INTEREST AGREEMENT (0.2); DRAFT ASSIGNMENT OF INTEREST (0.4); DISCUSSIONS WITH M. YAEGER RE: STRATEGY WITH RESPECT TO ASSIGNMENT (0.4).	1.20		
01/31/20	MLY	CORRESPONDENCE WITH CHEVRON RE DOCUMENT REVIEW (.2); TELECONFERENCE WITH A. SILVERMAN RE SAME (.2).	0.40		
	TOTAL FE	ES FOR PROFESSIONAL SERVICES	\$17,618.50		
ATTORNEY FEE SUMMARY					
MLY ABS	MICHAEL YAEGER 10.40 hours at \$665.00 = 6,916.00 ALE' B. SILVERMAN 13.50 hours at \$500.00 = 6,750.00				

# Case 1:11-cv-00691-LAK-RWL Document 2482-15 Filed 04/21/20 Page 15 of 29

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

**INTEREST** 

FEBRUARY 13, 2020 REF NO.: 14062-39418 INVOICE NUMBER: \*\*\*\*\*\*

\$

\$

1,666.26

19,697.76

RT* JK*	ROGER TRACEY* JAMES KUBICZ* TOTALS	6.60 8.90 39.40	hours at hours at	•	,			
TOTAL FEES FOR PROFESSIONAL SERVICES \$17,618								
COSTS INC	CURRED ON YOUR BEHALF AS POSTE	D JANUA	ARY 31, 2020					
12/18/19	PACER: COPIES - FEDERAL COURT D	OCUME	NT	40.70				
12/20/19	PACER: COPIES - FEDERAL COURT D CHARGE	OCUME	NT	9.20				
12/20/19	PACER: COPIES - FEDERAL COURT D CHARGE	OCUME	NT	0.10				
12/21/19	PACER: COPIES - FEDERAL COURT D CHARGE	OCUME	NT	0.20				
12/21/19	PACER: COPIES - FEDERAL COURT D CHARGE	OCUME	NT	9.30				
12/22/19	PACER: COPIES - FEDERAL COURT D CHARGE			11.40				
12/22/19	PACER: COPIES - FEDERAL COURT D CHARGE			0.10				
01/30/20	FILING/RECORDING FEE - VENDOR: K WALKER ATTORNEY SERVICE INC - F DRIVE UNDER SEAL IN SDNY			97.00				
01/17/20	EDISCOVERY DATA MANAGEMENT H \$5/GB:RELATIVITY DATA HOSTING \$5			55.00				
01/17/20	EDISCOVERY DATA MANAGEMENT ULLICENSES:RELATIVITY USER LICENS	_		190.00				
TOTAL CO	STS AS POSTED THROUGH JANUARY 3	31, 2020			\$413.00			

TOTAL AMOUNT DUE THIS INVOICE



#### ATTORNEYS AT LAW

Atlanta
Florham Park
Hartford
Los Angeles
Miami
New York
Orlando
Tallahassee
Tampa
Washington, DC
West Palm Beach

JOSHUA RIZACK & THE RISING GROUP CONSULTING, INC. 606 POST ROAD EAST, 614 WESTPORT, CT 06880

PLEASE REMIT TO:

CARLTON FIELDS P.O. Box 3239 | Tampa, Florida 33601-3239 813.223.7000 | fax 813 229.4133

www.carltonfields.com Fed ID: 59-1233896

Fed ID: 59-1233896 BY WIRE:

Wells Fargo Bank, N.A.
ABA No: 0248

Account No.:

SWIFT: US6S No.: 4575

MARCH 13, 2020

ATTORNEY: MICHAEL YAEGER REFERENCE NUMBER: 14062-39418

INVOICE NUMBER: 1048866

Due Date: Upon Receipt

RE: CHEVRON CORPORATION LITIGATION

EMAIL: JRIZACK@THERISINGGROUP.COM

LEGAL SERVICES POSTED THROUGH 02/29/20 COSTS ADVANCED POSTED THROUGH 02/29/20 INTEREST

CURRENT INVOICE TOTAL

\$ 28,043.50 \$ 330.00

2,217.17

30,590.67



Atlanta
Florham Park
Hartford
Los Angeles
Miami
New York
Orlando
Tallahassee
Tampa

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE

**RE: CHEVRON CORPORATION LITIGATION** 

MARCH 13, 2020 REF NO.: 14062-39418 Washington, DC West Palm Beach

**INVOICE NUMBER: 1048866** 

## PROFESSIONAL SERVICES AS POSTED THROUGH FEBRUARY 29, 2020

DATE	<u>INIT</u>	DESCRIPTION	<b>HOURS</b>
01/29/20	ABS	FURTHER REVISIONS TO ASSIGNMENT OF INTEREST '0.3() EMAILS WITH CLIENT RE: SAME '0.4(.	0.70
01/30/20	ABS	EMAILS WITH CHEVRON;S COUNSEL RE: REIMBURSEMENT OF DECEMBER 2019 ATTORNEYS; FEES '0.3() REVIEW DECEMBER 2019 INVOICE FOR PRIVILEGE '0.2() COMMUNICATIONS WITH CLIENT RE: ASSIGNMENT '0.4(.	0.90
02/03/20	MLY	CORRESPONDENCE AND TELECONFERENCES RE DOCUMENT REVIEW.	0.90
02/03/20	ABS	WORK WITH PRACTICE TECH TEAM IN CONNECTION WITH RESPONDING TO QUESTIONS RAISED IN CHEVRON;S 1/31/20 EMAIL '0.4() FURTHER ANALYSIS OF CHEVRON;S 1/31 EMAIL, INCLUDING TO, AMONG OTHER THINGS, IDENTIFY DIFFERENCES BETWEEN RIZACK;S PROPOSED EPIQ PAYMENT TERMS AND CHEVRON;S PROPOSED REVISIONS TO SAME '0.3() PREPARE EMAIL RESPONSE TO CHEVRON '0.2( AND MEET WITH M. YAEGER RE: SAME '0.2() EMAILS WITH EPIQ RE: CHEVRON;S PROPOSED REVISIONS TO PAYMENT TERMS '0.3() FURTHER REVISIONS TO ASSIGNMENT OF INTEREST COVER LETTER '0.2( AND EMAILS WITH CLIENT RE: SAME '0.2(.	1.90
02/03/20	JK*	UPDATE REVIEW WORKSPACE WITH LATEST ROUND OF SEARCH TERM HITS. PROVIDE DETAILS OF DEDUPING TO CASE TEAM	2.10
02/04/20	MLY	CORRESPONDENCE AND TELECONFERENCE RE DOCUMENT REVIEW AND DE-DUPING.	1.20
02/04/20	ABS	FURTHER EMAILS WITH CHEVRON'S COUNSEL RE: DOCUMENT REVIEW VENDOR-RELATED ISSUES '0.8( AND DISCUSSIONS WITH M. YAEGER RE: SAME '0.2() EMAILS WITH PRACTICE TECH TEAM RE: DEDUPLICATION '0.2() EMAILS WITH EPIQ RE: DEDUPLICATION '0.1(.	1.30

<u>DATE</u>	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
02/04/20	JK*	UPDATE REVIEW WORKSPACE WITH LATEST ROUND OF SEARCH TERM HITS.	2.10
02/05/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
02/05/20	ABS	EMAILS WITH CHEVRON;S COUNSEL '0.2() REVIEW AND REVISE EPIQ SERVICES AGREEMENT '0.4() COMMUNICATIONS WITH EPIQ RE: SAME '0.5(.	1.10
02/05/20	JK*	UPDATE REVIEW WORKSPACE WITH LATEST ROUND OF SEARCH TERM HITS. PROVIDE DETAILS TO CASE TEAM	1.10
02/06/20	ABS	EMAILS WITH EPIQ RE: REVISIONS TO SERVICE AGREEMENT.	0.30
02/07/20	MLY	CORRESPONDENCE AND TELECONFERENCE RE DOCUMENT REVIEW.	0.20
02/09/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
02/09/20	ABS	EMAIL CHEVRON'S COUNSEL RE: EPIQ TERM '0.1() EMAILS WITH EPIQ RE: FINALIZING SERVICES AGREEMENT '0.2(.	0.30
02/10/20	ABS	EMAIL FROM CHEVRON;S COUNSEL RE: CRYPSIS; INVOICES '0.2( AND EMAIL WITH CRYPSIS RE: SAME '0.1() EMAILS WITH EPIQ RE: SERVICES AGREEMENT '0.2( AND REVIEW FINALIZED AGREEMENT '0.1(.	0.60
02/11/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
02/11/20	ABS	EMAILS WITH CHEVRON;S COUNSEL RE: VARIOUS PROTOCOL ITEMS '0.3() WORK WITH PRACTICE TECH TEAM IN CONNECTION WITH PROCESSING THIRD-PARTY PRODUCTION DOCUMENTS FOR DEDUPLICATION '0.3(.	0.60
02/12/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
02/12/20	ABS	EMAILS WITH CHEVRON;S COUNSEL RE: DE- DUPLICATION '0.3() WORK WITH PRACTICE TECH TEAM IN CONNECTION WITH SAME '0.3() EMAILS WITH CLIENT RE: EPIQ SERVICES AGREEMENT '0.2(.	0.80
02/12/20	JK*	LOAD THIRD PARTY PRODUCTION DOCUMENTS TO RELATIVITY. RUN DE-DUPLICATION, EMAIL THREADING AND LANGUAGE IDENTIFICATION IN RELATIVITY WORKSPACE AS REQUESTED BY CASE TEAM	1.80
02/13/20	ABS	EMAILS WITH CLIENT RE: EPIQ '0.3() EMAILS WITH CRYPSIS RE: PAYMENT '0.3(.	0.60
02/13/20	JK*	RUN DUPLICATION ANAYLSIS ON DOCUMENTS IN	2.20

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
		RELATIVITY. REMOVE ALL DUPLICATES FROM DOCUMENTS REVIEW.	
02/14/20	ABS	EMAILS WITH EPIQ RE: SERVICES AGREEMENT '0.3() EMAILS WITH CLIENT RE: SAME '0.1(.	0.40
02/17/20	ABS	CALL WITH K. FAULKNER RE: RESPONDING TO CHEVRON;S EMAIL DISPUTING CRYPSIS;S INVOICES '0.8() EMAIL FROM CLIENT RE: EPIQ SERVICES AGREEMENT '0.1() WORK WITH PRACTICE TECHNOLOGY TEAM IN CONNECTION WITH DE-DUPLICATION EFFORTS '0.3(.	1.20
02/17/20	JK*	RUN DUPLICATION ANAYLSIS ON DOCUMENTS IN RELATIVITY. REMOVE ALL DUPLICATES FROM DOCUMENTS REVIEW.	1.40
02/18/20	MLY	CONFERENCE AND TELECONFERENCES RE DOCUMENT REVIEW.	0.90
02/18/20	ABS	WORK WITH PRACTICE TECHNOLOGY TEAM TO FINALIZE DE-DUPLICATION EFFORTS REQUESTED BY CHEVRON '0.4() ANALYZE DE-DUPLICATION DATA AND REPORTS REQUESTED BY CHEVRON '0.3() EMAILS WITH CHEVRON;S COUNSEL RE: SAME '0.3() EMAILS WITH EPIQ RE: E' ECUTED SERVICES AGREEMENT AND TIMELINE FOR REVIEW '0.3(.	1.30
02/18/20	JK*	RUN DUPLICATION ANAYLSIS ON DOCUMENTS IN RELATIVITY. REMOVE ALL DUPLICATES FROM DOCUMENTS REVIEW.	2.60
02/19/20	MLY	CONFERENCES AND CORRESPONDENCE RE DOCUMENT REVIEW.	0.70
02/19/20	ABS	TELECONFERENCE WITH EPIQ RE: PRELIMINARY DOCUMENT REVIEW MATTERS '0.6() EMAILS WITH EPIQ RE: SAME '0.3() WORK ON DOCUMENT REVIEW MEMO REQUESTED BY EPIQ '1.5(.	2.40
02/19/20	JK*	CALL WITH CASE TEAM AND OUTSIDE REVIEW TEAM TO DISCUSS CASE DETAILS	0.60
02/19/20	JK*	UPDATE REVIEW RELATIVITY WORKSPACE PERMISSIONS FOR OUTSIDE REVIEWERS AND REVIEW MANAGERS	0.70
02/20/20	ABS	EMAILS WITH EPIQ RE: REVIEW '0.5() CONTINUE DRAFTING DOCUMENT REVIEW MEMO REQUESTED BY EPIC '3.3() EMAIL WITH CHEVRON;S COUNSEL RE: CRYPSIS '0.1() EMAILS WITH K. FAULKNER RE: UNPAID	4.10

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
		INVOICES '0.2(.	
02/20/20	JK*	UPDATE REVIEW RELATIVITY WORKSPACE PERMISSIONS FOR OUTSIDE REVIEWERS AND REVIEW MANAGERS	0.70
02/21/20	JK*	UPDATE REVIEW RELATIVITY WORKSPACE PERMISSIONS AND UPDATE CODING OPTIONS FOR OUTSIDE REVIEWERS AND REVIEW MANAGERS	0.80
02/24/20	MLY	TELECONFERENCE RE DOCUMENT REVIEW.	0.20
02/24/20	ABS	FURTHER REVISIONS TO DOCUMENT REVIEW MEMO, INCLUDING IDENTIFYING RELEVANT E' HIBITS TO SAME '2.9() EMAILS WITH EPIQ RE: DOCUMENT REVIEW MEMO '0.2() WORK WITH PRACTICE TECHNOLOGY TEAM TO FINALIZE DOCUMENT REVIEW WORKSPACE PRIOR TO EPIQ START DATE '0.2(.	3.30
02/24/20	JK*	UPDATE REVIEW RELATIVITY WORKSPACE PERMISSIONS AND UPDATE CODING OPTIONS FOR OUTSIDE REVIEWERS AND REVIEW MANAGERS	0.80
02/25/20	MLY	CORRESPONDENCE AND TELECONFERENCE RE DOCUMENT REVIEW.	0.30
02/25/20	ABS	CALL WITH EPIQ REVIEW TEAM MANAGER RE: DOCUMENT REVIEW '0.4() REVISE AND FINALIZE DOCUMENT REVIEW MEMO AND ACCOMPANYING E' HIBITS '2.2(.	2.60
02/25/20	JK*	UPDATE REVIEW RELATIVITY WORKSPACE PERMISSIONS AND UPDATE CODING OPTIONS FOR OUTSIDE REVIEWERS AND REVIEW MANAGERS	1.70
02/26/20	MLY	TELECONFERENCES AND CORRESPONDENCE RE DOCUMENT REVIEW AND PRODUCTION.	1.40
02/26/20	ABS	EMAILS FROM CHEVRON;S COUNSEL RE: OUTSTANDING CRYPSIS AND CARLTON FIELDS INVOICES '0.4() DRAFT RESPONSE TO CHEVRON;S 2/10/20 REQUEST FOR ADDITIONAL DETAILS RE: CRYPSIS INVOICES '3.2() CONFER WITH CRYPSIS RE: SAME '0.8() EMAILS WITH EPIQ TEAM MANAGER RE: LOGISTICS OF DOCUMENT REVIEW '1.3() CONFERENCE CALL WITH ENTIRE EPIQ REVIEW TEAM RE: DOCUMENT REVIEW PROTOCOL '0.6() WORK WITH PRACTICE TECHNOLOGY TEAM TO FINALIZE DOCUMENT REVIEW WORKSPACE '0.3() REVIEW DOCUMENTS FORWARDED BY EPIQ REVIEWERS AND RESPOND TO QUESTIONS RE: SAME	6.90

DATE	<u>INIT</u>	DESCRIPTION				<u>HOURS</u>
		'0.3(.				
02/26/20	JK*	UPDATE REVIEW RELAT PERMISSIONS AND UPDA OUTSIDE REVIEWERS AN	ATE COD	ING OPTION		2.20
02/27/20	MLY	TELECONFERENCE AND DOCUMENT REVIEW.	CORRES	SPONDENCE	RE	1.00
02/27/20	ABS	EMAILS WITH EPIQ TEAM MANAGER RE: STATUS UPDATE '0.4() REVIEW QUALITY CONTROL DOCUMENT SET '1.3() EMAILS WITH EPIQ TEAM MANAGER RE: QC SET AND RELATED ISSUES '0.9() SPEAK WITH CLIENT RE: QUESTIONS RAISED DURING DOCUMENT REVIEW '0.4(				3.00
02/27/20	JK*	UPDATE REVIEW RELATIVITY WORKSPACE  PERMISSIONS AND UPDATE CODING OPTIONS FOR  OUTSIDE REVIEWERS AND REVIEW MANAGERS				0.40
02/28/20	MLY	CORRESPONDENCE AND DOCUMENT REVIEW.	CORRESPONDENCE AND CONFERENCES RE DOCUMENT REVIEW.			0.30
02/28/20	ABS	EMAILS WITH CLIENT RE: ASSIGNMENT OF INTEREST '0.3() EMAILS WITH EPIQ RE: STATUS OF DOCUMENT REVIEW '0.4() ANALYZE DOC REVIEW ISSUES RAISED BY EPIQ REVIEW TEAM '0.4(.				1.00
	TOTAL FEI	ES FOR PROFESSIONAL SI	ERVICES	}		\$28,043.50
ATTORNEY FEE SUMMARY						
MLY ABS JK*	MICHAEL ALE'B.S JAMES KU TOTALS	ILVERMAN 35.30 hours at \$500.00 =				4,987.50 17,650.00 5,406.00 \$28,043.50
TOTAL FEES FOR PROFESSIONAL SERVICES \$28,043.50						\$28,043.50

# Case 1:11-cv-00691-LAK-RWL Document 2482-15 Filed 04/21/20 Page 22 of 29

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

MARCH 13, 2020 REF NO.: 14062-39418 INVOICE NUMBER: 1048866

## COSTS INCURRED ON YOUR BEHALF AS POSTED FEBRUARY 29, 2020

02/19/20	EDISCOVERY DATA MANAGEMENT HOSTING \$5/GB:RELATIVITY DATA HOSTING \$5 - PER GB	60.00	
02/19/20	EDISCOVERY DATA MANAGEMENT USER LICENSES:RELATIVITY USER LICENSES	190.00	
02/28/20	EDISCOVERY DATA MANAGEMENT PROCESSING:RELATIVITY DATA PROCESSING - PER GB	80.00	
TOTAL CO	STS AS POSTED THROUGH FEBRUARY 29, 2020		\$330.00
INTEREST		\$	2,217.17
	TOTAL AMOUNT DUE THIS INVOICE	\$	30,590.67



#### ATTORNEYS AT LAW

Atlanta Florham Park Hartford Los Angeles Miami New York Orlando Tallahassee Tampa Washington, DC West Palm Beach

JOSHUA RIZACK & THE RISING GROUP CONSULTING, INC. 606 POST ROAD EAST, 614 WESTPORT, CT 06880

PLEASE REMIT TO:

**CARLTON FIELDS** P.O. Box 3239 | Tampa, Florida 33601-3239 813.223.7000 | fax 813 229.4133

www.carltonfields.com Fed ID: 59-1233896

EMAIL: JRIZACK@THERISINGGROUP.COM

BY WIRE:

Wells Fargo Bank, N.A. ABA No: 0248 US6S

Account No.:

SWIFT: 4575

**APRIL 7, 2020** 

ATTORNEY: MICHAEL YAEGER REFERENCE NUMBER: 14062-39418 INVOICE NUMBER: 1051784

Due Date: Upon Receipt

RE: CHEVRON CORPORATION LITIGATION

LEGAL SERVICES POSTED THROUGH 03/31/20 COSTS ADVANCED POSTED THROUGH 03/31/20 INTEREST

CURRENT INVOICE TOTAL

45,070.00 \$ 2,564.05 2,352.40

49,986.45



Atlanta
Florham Park
Hartford
Los Angeles
Miami
New York
Orlando
Tallahassee
Tampa

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE

**RE: CHEVRON CORPORATION LITIGATION** 

APRIL 7, 2020 REF NO.: 14062-39418 Washington, DC West Palm Beach

INVOICE NUMBER: 1051784

## PROFESSIONAL SERVICES AS POSTED THROUGH MARCH 31, 2020

DATE	<u>INIT</u>	DESCRIPTION	<b>HOURS</b>
03/01/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
03/01/20	ABS	EMAIL CHEVRON'S COUNSEL WITH ASSIGNMENT OF INTEREST WITH MODIFICATIONS REQUESTED BY CHEVRON (0.1); REVIEW DOCUMENTS INCLUDED ON EPIQ ISSUE LOG (0.6); RESPONSE TO EPIQ ISSUE LOG QUESTIONS (0.5).	1.20
03/02/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.40
03/02/20	ABS	RESPOND TO QUESTIONS FROM EPIQ RE: DOCUMENT REVIEW (0.3); REVIEW/ANALYZE QUALITY CONTROL SET (1.2); EMAILS WITH CLIENT RE: QUESTIONS RAISED DURING DOCUMENT REVIEW (0.2); EMAILS WITH EPIQ TEAM MANAGER RE: STATUS/PROGRESS OF DOCUMENT REVIEW (0.4).	2.10
03/02/20	JK*	REVIEW LOGS AND UPDATES FROM REVIEW TEAM	0.40
03/03/20	ABS	EMAILS WITH EPIQ TEAM MANAGER RE: STATUS OF DOCUMENT REVIEW.	0.30
03/03/20	JK*	REVIEW LOGS AND UPDATES FROM REVIEW TEAM. UPDATE REVIEWER PERMISSIONS IN RELATIVITY.	1.10
03/04/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.20
03/04/20	ABS	EMAILS WITH CLIENT RE: DOCUMENT REVIEW (0.2); EMAILS WITH EPIQ TEAM MANAGER RE: STATUS OF DOCUMENT REVIEW (0.2).	0.40
03/04/20	JK*	REVIEW LOGS AND UPDATES FROM REVIEW TEAM. UPDATE REVIEWER PERMISSIONS IN RELATIVITY.	1.10
03/05/20	MLY	CORRESPONDENCE AND TELECONFERENCES RE DOCUMENT TWICE.	0.30
03/05/20	ABS	COMMUNICATIONS WITH EPIQ MANAGER RE: PROGRESS OF DOCUMENT REVIEW (0.7); CONFERENCE WITH M. YAEGER RE: DOCUMENT REVIEW AND NEXT STEPS (0.3); ANALYZE DOCUMENTS IDENTIFIED IN EPIQ	1.30

# Case 1:11-cv-00691-LAK-RWL Document 2482-15 Filed 04/21/20 Page 25 of 29

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

DATE	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
		ISSUE LOG (0.3).	
03/06/20	MLY	CORRESPONDENCE AND TELECONFERENCES RE DOCUMENT REVIEW.	0.50
03/06/20	ABS	MULTIPLE COMMUNICATIONS WITH EPIQ MANAGER RE: STATUS OF DOCUMENT REVIEW AND RELATED QC ISSUES (1.6); REVIEW/ANALYZE VARIOUS QUALITY CONTROL DOCUMENT SETS AND ADDRESS RELATED QC ISSUES (4.1).	5.70
03/06/20	JK*	REVIEW LOGS AND UPDATES FROM REVIEW TEAM. UPDATE REVIEWER PERMISSIONS IN RELATIVITY. UPDATE DOCUMENT REVIEW POPULATION FOR REVIEW TEAM AS REQUESTED BY CF CASE TEAM	2.10
03/07/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
03/08/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
03/09/20	MLY	CORRESPONDENCE AND TELECONFERENCES RE DOCUMENT REVIEW.	1.00
03/09/20	ABS	ANALYZE DOCUMENT IN CONNECTION WITH FIRST- LAYER REVIEW QUALITY CONTROL (3.9); CALLS/EMAILS WITH EPIQ TEAM MANAGER RE: VARIOUS DOCUMENT REVIEW QC ISSUE (0.8); COMMUNICATIONS WITH CLIENT RE: DOCUMENT REVIEW (0.4).	5.10
03/09/20	JK*	CREATE NEW SEARCHES IN RELATIVITY FOR PRODUCED DOCUMENTS AS REQUESTED BY CASE TEAM AND REVIEW TEAM	2.40
03/10/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
03/10/20	HS*	TARGETED DOCUMENT REVIEW QC.	3.40
03/11/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.20
03/11/20	ABS	EMAILS WITH CLIENT RE: DOCUMENT REVIEW (0.5); WORK WITH INTERNAL PRACTICE TECH TEAM RE: FINALIZING FIRST-LEVEL QC (0.4); EMAIL FROM CHEVRON'S COUNSEL RE: CRYPSIS INVOICES AND DOCUMENT REVIEW STATUS AND PREPARE RESPONSE TO SAME (0.5); ANALYZE DOCUMENT FOR PURPOSES OF FINALIZING FIRST-LEVEL REVIEW QC (2.1); EMAILS WITH EPIQ TEAM MANAGER RE: QC AND FINALIZING FIRST-LEVEL REVIEW (0.3).	3.80
03/11/20	HS*	REVIEW DOCUMENTS WITH ALEX SILVERMAN AND MASS TAG FOR TECH ISSUES.	0.80

# Case 1:11-cv-00691-LAK-RWL Document 2482-15 Filed 04/21/20 Page 26 of 29

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE RE: CHEVRON CORPORATION LITIGATION

<u>DATE</u>	<u>INIT</u>	DESCRIPTION	<u>HOURS</u>
03/12/20	ABS	COMMUNICATIONS WITH CLIENT RE: DOCUMENT REVIEW (1.3); WORK WITH PRACTICE TECHNOLOGY TEAM IN CONNECTION WITH SECOND-LEVEL REVIEW (0.3); REVIEW SECOND-LEVEL QUALITY CONTROL SET (5.6).	7.20
03/12/20	JK*	CREATE NEW SEARCHES FOR DUPLICATE, PREVIOUSLY PRODUCED AND EMAIL THREADED DOCUMENTS IN RELATIVITY AS REQUESTED BY CASE TEAM.	0.70
03/13/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.30
03/13/20	ABS	EMAIL FROM CHEVRON'S COUNSEL RE: CRYPSIS (0.2); ADDITIONAL EMAILS WITH CLIENT RE: DOCUMENT REVIEW (0.8); CONFERENCE WITH M. YAEGER RE: DOCUMENT REVIEW (0.2); WORK WITH PRACTICE TECHNOLOGY TEAM RE: SECOND-LEVEL REVIEW (0.5); FURTHER REVIEW OF QUALITY CONTROL SET (3.5).	5.20
03/13/20	JK*	CREATE NEW SEARCHES FOR DUPLICATE, PREVIOUSLY PRODUCED AND EMAIL THREADED DOCUMENTS IN RELATIVITY AS REQUESTED BY CASE TEAM.	1.70
03/14/20	ABS	CALL/EMAILS WITH CLIENT RE: SECOND-LEVEL DOCUMENT REVIEW.	0.30
03/14/20	JK*	UPDATE SEARCHES IN RELATIVITY AS REQUESTED BY CASE TEAM.	0.40
03/16/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.20
03/16/20	ABS	COMMUNICATIONS WITH CLIENT RE: DOCUMENT REVIEW (1.2); WORK WITH INTERNAL PRACTICE TECHNOLOGY RE: VARIOUS DOCUMENT REVIEW ISSUES (0.5); REVIEW/ANALYZE PRIVILEGED DOCUMENTS (0.6); REVIEW/ANALYZE ADDITIONAL DOCUMENTS IN QUALITY CONTROL SET (2.3).	4.60
03/16/20	JK*	CREATE NEW FINAL REVIEW SEARCHES IN RELATIVITY AS REQUESTED BY CASE TEAM.	0.90
03/17/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.10
03/17/20	ABS	COMMUNICATIONS WITH CLIENT RE: SECOND-LEVEL REVIEW (1.3); FURTHER REVIEW OF SECOND-LEVEL QUALITY CONTROL SET (2.9).	4.20
03/17/20	HS*	TARGETED DOCUMENT REVIEW QC.	1.60
03/18/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW AND PRODUCTION	0.10

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE

**RE: CHEVRON CORPORATION LITIGATION** 

DATE	<u>INIT</u>	DESCRIPTION	HOURS
03/18/20	ABS	WORK WITH INTERNAL PRACTICE TECH TEAM TO FINALIZE DOCUMENT REVIEW AND MAKE PRODUCTION (0.8); REVIEW/ANALYZE DOCUMENTS IN CONNECTION WITH SAME (1.6).	2.40
03/18/20	HS*	TARGETED DOCUMENT REVIEW QC.	3.20
03/18/20	JK*	CREATE AND UPDATE FINAL REVIEW SEARCHES IN RELATIVITY AS REQUESTED BY CASE TEAM.	2.10
03/19/20	MLY	CORRESPONDENCE RE DOCUMENT REVIEW.	0.20
03/19/20	ABS	EMAILS WITH CLIENT RE: DOCUMENT REVIEW (0.3); CONTINUE WORKING WITH PRACTICE TECH TEAM TO FINALIZE PRODUCTION (1.3); FURTHER DOCUMENT REVIEW AND VARIOUS OTHER WORK IN CONNECTION WITH FINALIZING PRODUCTION AND PRIVILEGE LOG (2.2).	3.80
03/19/20	JK*	CREATE AND UPDATE FINAL REVIEW SEARCHES IN RELATIVITY AS REQUESTED BY CASE TEAM.	2.80
03/20/20	MLY	CORRESPONDENCE AND TELECONFERENCES RE DOCUMENT PRODUCTION.	0.50
03/20/20	ABS	CONTINUE WORKING PRACTICE TECHNOLOGY TEAM IN CONNECTION WITH FINALIZING PRODUCTION AND PRIVILEGE LOG (1.6); CONFERENCE WITH M. YAEGER RE: FINALIZING PRODUCTION (0.3); REVISE AND FINALIZE PRIVILEGE LOG FOR PRODUCTION (0.5); REVIEW/ANALYZE DOCUMENTS IN PREPARATION FOR PRODUCTION (1.3); EMAILS TO CHEVRON'S COUNSEL WITH FINAL DOCUMENT PRODUCTION (0.2); EMAILS WITH CLIENT RE: FINAL PRODUCTION (0.1).	4.00
03/20/20	JK*	CREATE AND UPDATE FINAL REVIEW SEARCHES IN RELATIVITY AS REQUESTED BY CASE TEAM. UPDATE PRIVILEGE LOG SEARCH	2.80
03/20/20	JK*	CONFIRM PRODUCTION DETAILS WITH CASE TEAM. CREATE SAVED SEARCHES IN RELATIVITY OF DOCUMENTS AND TAG FOR PRODUCTION. CONFIRM IMAGE AND ADD STAMPS TO DOCUMENTS. EXPORT DOCUMENTS, METADATA, NATIVE FILES AND IMAGES TO FILE SHARING SITE.	1.10
03/25/20	MLY	TELECONFERENCE AND CORRESPONDENCE RE LETTER FOR FEES OWED.	1.00
03/25/20	ABS	CONFERENCE WITH M. YAEGER TO DISCUSS STRATEGY RE: RENEWED MOTION FOR ATTORNEYS' FEES.	1.00

RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE

**RE: CHEVRON CORPORATION LITIGATION** 

APRIL 7, 2020

REF NO.: 14062-39418 INVOICE NUMBER: 1051784

DATE	INUT	DESCRIPTION				HOURS
<b>DATE</b> 03/26/20	INIT ABS	DESCRIPTION  DRAFT LETTER BRIEF IN CONNECTION WITH RENEWED FEE APPLICATION (2.0); RESEARCH CASE LAW RE: SAME (2.3); ANALYZE PRIOR COURT FILINGS AND COMMUNICATIONS BETWEEN COUNSEL RE: SAME (1.3); COMMUNICATIONS WITH EPIQ RE: INVOICING (0.2).				
03/27/20	MLY	CORRESPONDENCE R AND COSTS.	E LETTER	TO COURT I	RE FEES	0.10
03/27/20	ABS	CONTINUE DRAFTING/REVISING FEE APPLICATION LETTER (2.4); FURTHER ANALYSIS OF CASE LAW RE: SAME (0.5); FURTHER ANALYSIS OF RIZACK FILINGS AND COUNSEL COMMUNICATIONS (0.5); ANALYSIS OF RIZACK'S MOST RECENT DOCUMENT PRODUCTION IN CONNECTION WITH SAME (2.0).				5.40
03/31/20	MLY	DRAFTING LETTER BR	IEF RE FEE	ES AND COS	TS.	1.30
03/31/20	ABS	COMPLETE INITIAL DRAFT OF LETTER BRIEF RE: RENEWED FEE APPLICATION (1.1); FURTHER ANALYSIS OF NEW YORK LAW IN CONNECTION WITH SAME (0.5); BEGIN DRAFTING DECLARATION IN SUPPORT OF FEE APPLICATION (0.3).				1.90
TOTAL FEES FOR PROFESSIONAL SERVICES						\$45,070.00
<u>ATTORNE</u>	Y FEE SUMM	<u>IARY</u>				
MLY ABS HS* JK*	MICHAEL ALEX B. S HANNA ST JAMES KU TOTALS	ILVERMAN FRANGE*	6.80 65.70 9.00 19.60 101.10	hours at hours at hours at hours at	\$665.00 \$500.00 \$300.00 \$255.00	= 32,850.00 = 2,700.00
TOTAL FEES FOR PROFESSIONAL SERVICES \$45,070.00						

## COSTS INCURRED ON YOUR BEHALF AS POSTED MARCH 31, 2020

	POSTAGE	1.00
03/26/20	MEALS - VENDOR: HANNA STRANGE - 03/10/20 -	7.31
	DINNER DURING DOCUMENT REVIEW	
03/26/20	GROUND TRANSPORTATION - VENDOR: HANNA	25.74
	STRANGE - 03/10/20 - LATE NIGHT CAB DURING	

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RIZACK, JOSHUA & RISING GROUP CONSULTING, INC, THE APRIL 7, 2020 **RE: CHEVRON CORPORATION LITIGATION** REF NO.: 14062-39418 **INVOICE NUMBER: 1051784 DOCUMENT REVIEW** 60.00 03/20/20 EDISCOVERY DATA MANAGEMENT HOSTING \$5/GB:RELATIVITY DATA HOSTING \$5 - PER GB 03/20/20 EDISCOVERY DATA MANAGEMENT USER 2,470.00 LICENSES:RELATIVITY USER LICENSES TOTAL COSTS AS POSTED THROUGH MARCH 31, 2020 \$2,564.05 **INTEREST** 2,352.40 \$

TOTAL AMOUNT DUE THIS INVOICE

\$

49.986.45